

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No.
	)	
FORTY THOUSAND DOLLARS	)	
(\$40,000.00) U.S. CURRENCY,	)	
	)	
	)	
Defendant.	)	

**VERIFIED COMPLAINT OF FORFEITURE**

Comes now plaintiff, United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Stephen Casey, Assistant United States Attorney, for said district, and in a civil cause of action for forfeiture respectfully states as follows:

1. In this *in rem* civil action the United States seeks forfeiture of certain property, currently in the possession and custody of the plaintiff pursuant to the provisions of Title 21, United States Code, Section 881.
2. Subject Matter Jurisdiction of this Court is based on Title 28, United States Code, Sections 1345, 1355(a), and Title 21, United States Code, Section 881. *In rem* jurisdiction is based on Title 28, United States Code, Section 1355. Venue is proper in this district pursuant to Title 28, United States Code, Sections 1355 & 1395 and Title 21, United States Code, Section 881(j).
3. The defendant property was furnished or intended to be furnished in exchange for controlled substances in violation of the Controlled Substances Act, Title 21, United States Code,

Section 801 *et seq.*, was proceeds traceable to such an exchange, and was used or intended to be used to facilitate such an exchange. The defendant property is therefore subject to forfeiture to the United States of America, under the provisions of Title 21, United States Code, Section 881(a)(6).

4. The defendant property was seized in the Eastern District of Missouri and is now, and during the pendency of this action will be in the jurisdiction of this court.

5. On or about November 13, 2012, the defendant currency (\$40,000.00) was seized from Cesar LEON-REYNOSO and Abel FABILA-PERALTA by the Drug Enforcement Administration and Illinois State Police. The plaintiff alleges the defendant property is subject to forfeiture and for its reasons states as follows:

6. In July 2012, investigators initiated an investigation into a drug-trafficking organization involving Cesar LEON-REYNOSO, and multiple other individuals, who were distributing large quantities of marijuana throughout the St. Louis, Missouri area.

7. Investigators have utilized source information, law-enforcement surveillance operations, statements made by individuals as part of this investigation, Title III wiretap intelligence, and other investigative procedures to identify the extent of LEON-REYNOSO's involvement in the drug trafficking enterprise.

8. On or about November 13, 2012, investigators observed LEON-REYNOSO take part in a drug transaction where marijuana was sold for cash. Investigators observed LEON-REYNOSO depart the scene of the transaction and head east toward Chicago in a car driven by FABILA-PERALTA and registered to Jose REYNOSO. Investigators surveilled the vehicle while it traveled on Interstate 55 until just south of Litchfield, Illinois. There, investigators requested the assistance from the Illinois State Police to affect an investigative stop.

9. Trooper Holiday with the Illinois State Police conducted a traffic stop of the vehicle for expired plates. Following a brief conversation with the driver, FABILA-PERALTA and passenger, LEON-REYNOSO, Trooper Holiday retrieved his canine partner, who immediately indicated/alerted on the vehicle for the presence of drugs. Trooper Holiday then conducted a probable cause search of the vehicle and located a plastic bag containing four bundles of U.S. Currency on the backseat, and several open cans of alcoholic beverages located within the center console and passenger side rear floor board. Trooper Holiday questioned LEON-REYNOSO and FABILA-PERALTA about the currency, who both denied having any knowledge of the same. An official count conducted subsequent to the seizure determined the total amount to be \$40,000.00.

10. On May 14, 2014, Cesar LEON-REYNOSO was indicted in cause number 4:14CR00146 CDP on charges of conspiracy to distribute and possess with intent to distribute marijuana in violation of Title 21, United States Code, Section 846. Included in the indictment is a Forfeiture Allegation that includes the exact same defendant real property which the government seeks to forfeit in the instant case. A warrant has been issued for LEON-REYNOSO's arrest, however LEON-REYNOSO is currently a fugitive.

11. The only people known to have any possible interests in the defendant property are Cesar LEON-REYNOSO, Jose REYNOSO and Abel FABILA-PERALTA.

12. By reason of these premises, the defendant property is subject to forfeiture to the United States, pursuant to the provisions of Title 21, United States Code Section 881.

WHEREFORE, Plaintiff prays that a Warrant for Arrest be issued for the defendant property and the defendant property be condemned and forfeited to the United States of America,

in accordance with the provisions of law; and that the plaintiff be awarded its costs in this action, and have such other relief as provided by law and the nature of the case may require.

Dated: August 5, 2014

Respectfully submitted,

RICHARD G. CALLAHAN  
United States Attorney

/s/ Stephen Casey

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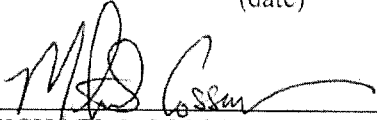
VERIFICATION

I, Special Agent Michael J. Cossou, hereby verify and declare under penalty of perjury that I am a Special Agent with the United States Drug Enforcement Administration, that I have read the foregoing Verified Complaint *in rem* and know the contents thereof, and that the matters contained in the Verified Complaint are true to my own knowledge, except that those matters herein stated to be alleged on information and belief and as to those matters I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Special Agent of the Drug Enforcement Administration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 08-04-2014  
(date)

  
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MICHAEL J. COSSOU  
Special Agent  
Drug Enforcement Administration